



August 5, 2016

Gabriel Corley, Project Manager
Division of Transportation Planning, MS□32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274□0001

Re: Recommendations to Strengthen the 2016 California Transportation Plan (CTP) Guidelines

Dear Mr. Corley:

Thank you for the opportunity to comment on the draft 2016 California Transportation Plan (CTP) Guidelines and for all your work on putting together the Guidelines. Our organizations were engaged in the development of the CTP 2040, including serving on the Policy Advisory Committee. While the CTP 2040 outlines an ambitious long-range vision for a sustainable, multimodal, and equitable transportation system that we strongly support, the CTP 2040 lacked actionable policy recommendations and implementation steps. Accordingly, we offer the following recommendations for the Guidelines that we believe would empower Caltrans to truly lead in long-range transportation planning for the state to achieve its climate goals, while maximizing health, safety, and equity co-benefits in the development of future CTPs:

Clarify & Strengthen Relationship between the CTP, State Modal Plans, Other Caltrans Planning Documents, and Regional Transportation Plans (RTPs)

As a visioning document, the CTP should outline the state's transportation policies and priorities that should then inform transportation investments and other decisions not only by state agencies but also regional and local agencies. As currently written, the Guidelines provide no clear or meaningful pathway between the CTP strategies and objectives and RTPs--consistency should be explicitly defined--in order to achieve statewide climate targets across all component plans--and the CTP should be leveraged to provide the venue for mediating conflicting policies, programs, and investments contained in the various state modal plans, Caltrans planning documents (e.g., Caltrans Strategic management Plan, Transportation Concept Reports, etc.), and RTPs. In other words, the CTP should not simply be a compilation of state modal plans and RTPs but rather a more meaningful document where transportation planners, decision-makers, and the general public at all levels can easily comprehend and in turn operationalize the state's transportation policies and priorities. Moreover, the CTP Guidelines should be more closely aligned with the RTP Guidelines. If developed as documents that mirror the same general topics discussed, but at different scales, this approach can help strengthen the CTP by

providing an opportunity for the state to directly address topics as framed within RTPs, but at a statewide level.

Establish Minimum, Uniform Set of Transportation System Performance Measures

One potential strategy for strengthening the relationship and consistency between the CTP, modal plans, and RTPs is to develop a standard minimum set of performance measures for transportation investments that all modal plans and RTPs must use in order to be evaluated for consistency with the CTP and progress toward statewide policy goals. These performance measures would need to also address land use, public health, social equity, and environmental considerations to be connected to and help guide the development of the regions' Sustainable Communities Strategies.

Require the Inclusion of an Implementation Element

While the CTP 2040 provides a sound foundation as a visioning document, it currently lacks any implementation measures nor does it prioritize implementation of identified recommendations either between goals/policies or within goals/policies. Since the CTP is a long-range planning document, a short-range implementation element will help usher in phased implementation of the CTP's numerous recommendations. Accordingly, we strongly urge the Guidelines include the requirement of an Implementation Element, as well as to detail the contents and form of the element—including but not limited to recommendations to guide state and regional transportation investments. Such a requirement would align the CTP Guidelines and future CTPs with requirements set forth in SB 64 (Liu 2015) that require the preparation of “specific, action-oriented, and pragmatic recommendations for transportation system improvements” based on the CTP's recommendations.

Improve Modeling to Account for Land Use and Induced Demand & Directly Tie Modeling to Recommendations and Implementation

The modeling section does not provide guidance on what the desired inputs and outputs are and consequently, seems removed from the rest of the plan. Moreover, the outputs from the modeling should directly tie and/or inform the recommendations contained in the CTP. Accordingly, we recommend that the Guidelines identify the desired inputs—including those that were unavailable in time for the preparation of the CTP 2040 such as local and regional land use data and induce demand of vehicle miles traveled through roadway capacity expansion projects—and provide direction to improve modeling to include all desired inputs, as well as to require that recommendations be directly tied to model outputs. Many regions are still planning significant roadway expansion to accommodate future growth instead of considering smart, efficient growth and transportation options—the Guidelines should provide direction on how modeling should account for the impact of these investments and their induced demand of vehicle miles traveled on the state's greenhouse gas emissions.

Lastly, we offer specific recommendations for improving the Guidelines language. Page references are provided below:

Section	Page	Subsection	Comment
Introduction	3	Purpose	While the CTP Guidelines won't be a step-by-step guide for preparing the CTP, it should provide guidance on how to interpret and operationalize state and federal statutes. We recommend that the purpose clarify that the document will provide the necessary guidance in addition to the references to state/federal law.
Introduction	3-4	Relationship Between the California Transportation Plan and Regional Transportation Plans	As currently written, the Guidelines make it seem like state modal plans and RTPs feed into the CTP in a unidirectional manner. As a result, the CTP could be seen as simply a compilation of all lower level plans. The CTP can and should be much more than a simple compilation of plans, however, and this section should be revised to clarify that the plans influence one another in both directions.
1	10	Legislation and Executive Orders	This section lacks reference to and discussion of SB 64 (Liu 2015), which requires the CTC to "prepare specific, action-oriented, and pragmatic recommendations for transportation system improvements" based on the CTP's recommendations.
2	13	Elements of the CTP-Policy Element	The Guidelines should provide guidance and detail which documents and resources the CTP should draw upon in order to shaping the specific policy direction of the plan.
2	14	Elements of the CTP-Strategies Element-Plan Integration-Modal Plans	The Guidelines state that the CTP "should identify a sustainable transportation system by pulling together the State's long-range modal plans." However, the current development of the California Statewide Bicycle & Pedestrian Plan (CSBPP) has emphasized that the CSBPP is driven in large part by the CTP 2040. This circular reasoning is yet another reason for why the CTP cannot simply be a compilation of the plans below it. We recommend that this be re-written to clarify that the CTP should be influencing the modal plans and to a lesser extent, vice versa.
2	17-18	Elements of the CTP-Recommendations Element-Economic Forecast and Analysis	While the CTP is not required to include fiscally constrained project lists, the model should make reasonable assumptions about the state, regional, and local investments required to meet the various policy strategies deployed to meet

			<p>the statewide GHG targets.</p> <p>Additionally, revise as follows: “At the very least, the econometric model should report as outputs from an economic impact assessment: jobs including jobs and training targeted to individuals with employment barriers¹, value added, and income, public health impacts and benefits, and social and economic equity impacts on disadvantaged communities, at the state and regional level”</p> <p>“Caltrans should follow the public participation protocols currently in place and make every effort possible to present the analysis, and accompanying results, at a level of detail that reaches the greatest level of the public, which may require additional outreach and education of residents from disadvantaged communities”</p>
2	19	Elements of the CTP-Recommendations Element-Overview of Transportation System	<p>Bicycle and pedestrian networks should be explicitly called out as a separate element of the transportation system.</p> <p>Transit should be reframed as “Regional and Local Transit Networks”</p>
2	20-21	Elements of the CTP-Recommendations Element-Emerging Trends	<p>This section lacks mention of the increased mode share of walking, biking, and transit over the past decade as shown in the latest California Household Travel Survey.</p> <p>Additionally, this section should include the increasing adoption and prevalence of Complete Streets policies and practices.</p>
2	21-22	Elements of the CTP-Recommendations Element-Performance Measures	<p>This entire section lacks specificity on the minimum set of uniform performance measures that should guide transportation investments and provides no guidance on how performance measures, benchmarks, targets, and monitoring should be developed and on what sources these should be based. At a minimum, the Guidelines should highlight data sources on which to base</p>

¹ As defined by Section 14005 Letter J of the Unemployment Insurance Code:
http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB1270

			the development of performance measures, benchmarks, and targets, as well as define what should be monitored and how regularly.
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Thank you again for allowing us the opportunity to comment on the Guidelines. This document has the potential to transform the state's transportation planning and funding decisions in many communities in the state and create safe, healthy, walkable and equitable neighborhoods for people of all ages, incomes and abilities.

If you have any questions, feel free to contact Tony Dang, Deputy Director, California Walks at tony@californiawalks.org or (510) 507-4943.

Sincerely,

Wendy Alfsen, Executive Director
California Walks

Bill Sadler, California Senior Policy Manager
Safe Routes to School National Partnership

Jeanie Ward-Waller, Policy Director
California Bicycle Coalition

Angela Glover Blackwell, President and CEO
PolicyLink

Cc:

Susan Bransen, CTC, Executive Director, susan.bransen@dot.ca.gov

Kristina Assouri, CTC, Chief Deputy Director, kristina.assouri@dot.ca.gov

Garth Hopkins, CTC, Deputy Director, garth.hopkins@dot.ca.gov

Laura Pennebaker, CTC, Associate Deputy Director, laura.pennebaker@dot.ca.gov

Mary D. Nichols, Air Resources Board, Chair, mnichols@arb.ca.gov

Kurt Karperos, Air Resources Board, Deputy Executive Officer, kurt.karperos@arb.ca.gov

Steven Cliff, Air Resources Board, Senior Advisor to the Chair, scliff@arb.ca.gov

Nicole Dolney, Chief, Air Resources Board, Transportation Planning Branch,
ndolney@arb.ca.gov

Terry Roberts, Air Resource Board, Sustainable Communities Policy and Planning Section,
troberts@arb.ca.gov

Heather King, Air Resources Board, Sustainable Communities Policy and Planning Section,
heather.king@arb.ca.gov

Ken Alex, Office of Planning & Research, ken.alex@gov.ca.gov

Chris Ganson, Office of Planning & Research, chris.ganson@opr.ca.gov

Sahar Shirazi, Office of Planning & Research, sahar.shirazi@opr.ca.gov

Randall Winston, Strategic Growth Council, randall.winston@sgc.ca.gov

Allison Joe, Strategic Growth Council, allison.joe@sgc.ca.gov

Darwin Moosavi, Strategic Growth Council, darwin.moosavi@sgc.ca.gov